

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)
RAYMOND WASHINGTON and) Bankruptcy No.: 10-24366-CMB
SHARON WASHINGTON,)
Debtors.) Chapter 13

COUNTY OF ALLEGHENY,)
Movant,) Related to Document No. 227, 228 & 229
v.)
RAYMOND WASHINGTON and) Hearing Date and Time:
SHARON WASHINGTON,) October 11, 2016 @ 1:30 P.M.
Respondents.)

**STIPULATION BETWEEN RAYMOND WASHINGTON, SHARON WASHINGTON
AND THE COUNTY OF ALLEGHENY REGARDING THE APPROVAL OF
DEBTOR'S AMENDED CHAPTER 11 PLAN DATED APRIL 4, 2014**

AND NOW, comes Debtors, Raymond Washington, Sharon Washington, and Movant, County of Allegheny, by and through their undersigned counsel, and file this Stipulation of which the parties agree as follows:

1. On June 17, 2010, Raymond Washington and Sharon Washington ("Debtors") filed a Chapter 13 bankruptcy case at the above-captioned bankruptcy number. This case was subsequently converted to a Chapter 11 bankruptcy on April 16, 2013.

2. Debtors are the owners of the following parcels of real estate situate within the County of Allegheny, Commonwealth of Pennsylvania: (a) Block and Lot 296-C-228 and further known as 132 Howard Street, Pittsburgh, PA 15235; and (b) Block and Lot 368-K-214 and further known as 408 Elias Drive, Pittsburgh, PA 15235 (collectively the "Properties").

3. The County of Allegheny ("County") is secured creditor in the within bankruptcy case by virtue of delinquent real estate taxes owed for the Properties.

4. On October 12, 2010, the County filed Proof of Claim No. 25-1 at the within proceeding for tax years 2008-2010 for delinquent real estate taxes owed for the Properties in the amount of \$2,801.18, plus statutory interest accruing at the rate of 12% per annum on the face amount of \$1,552.98.

5. On April 4, 2014, Debtors filed their Amended Disclosure Statement and Amended Plan dated April 4, 2014 (the “Amended Disclosure Statement” and the “Amended Plan”).

6. The Debtors and County have agreed to amend and revise the Amended Plan as follows:

a) The pre-petition and post-petition real estate tax claims of the County are undisputed statutory liens secured against the Properties. These statutory liens shall be retained by the County and shall remain liens against the Properties until paid in full. The Debtor shall pay the County’s secured claims as follows:

(1) With regard to the property located at 408 Elias Drive, Pittsburgh, PA 15202 (B/L 368-K-214), within twelve (12) months of the Confirmation Date, Debtors shall pay the County’s Class 5 secured claim in full including all applicable penalties, costs, expenses, fees and statutory interest of twelve percent (12%) per year, all of which shall continue to accrue until said real estate taxes are paid in full.

(2) With regard to the property located at 132 Howard Street, Pittsburgh, PA 15202 (B/L 296-C-228), the Debtors shall surrender this property. As a result of the surrender of this property by the Debtors, any confirmation of the Debtors’ Amended Plan shall not effect in any manner whatsoever the County’s secured liens for unpaid real estate taxes owed or the County’s ability to utilize its legal and statutory remedies to collect said taxes. Therefore, the County may pursue the collection of any and all unpaid real estate taxes (whether incurred pre-petition and post-petition) utilizing all applicable legal and statutory remedies without regard to any other provision to the contrary in the Amended Plan and without any obligation to provide any additional notice to Debtors or Debtor’s counsel as may be required under the Amended Plan.

b) In the event that the Debtors fail to make the payment to the County specified in paragraphs 6(a)(1) herein, then the County may pursue collection of the outstanding balance due utilizing its legal and statutory remedies without regard to any other provision to the contrary in the Amended Plan and without any obligation to provide any additional notice to Debtors or Debtors’ counsel as may be required under the Amended Plan.

c) No tax liability of the County accruing prior to confirmation of the plan is discharged until paid in full. Any tax, penalty, costs, expense and interest not encompassed within this Stipulation that is subsequently determined to be owing shall be paid by the Debtors and no administrative tax liability shall be deemed discharged until paid in full.

d) Until such time as all obligations due pursuant to this Stipulation are paid in full, the County may administratively apply any tax credit or refunds otherwise owed to the Debtor to any outstanding indebtedness.

e) In the event of a conflict between the Amended Plan, Amended Disclosure Statement and this Stipulation, the terms of this Stipulation shall control.

7. Upon the entry and approval of this Stipulation, the County agrees to vote in favor of the Debtor's Amended Plan.

8. The parties agree that a signature transmitted electronically or by facsimile shall be accorded the same force and effect as an original signature and may be submitted to the Court. Any amendments to this Stipulation must be in writing, signed by all parties or their respective counsel.

APPROVED BY:

By: /s/ Jeffrey R. Hunt

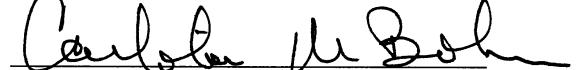
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Counsel for County of Allegheny

By: /s/ Brian C. Thompson

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Warrendale, PA 15086
(412) 823-8080
bthompson@thompsonattorney.com
Counsel for Debtors

THIS STIPULATION IS APPROVED THIS 11th DAY OF October, 2016.

BY THE COURT:


JUDGE CARLOTTA M. BÖHM
UNITED STATES BANKRUPTCY JUDGE

FILED
10/12/16 10:29 am
CLERK
U.S. BANKRUPTCY
COURT - WDPA

In re:
Raymond Washington
Sharon Washington
Debtors

Case No. 10-24366-CMB
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0315-2

User: kthe
Form ID: pdf900

Page 1 of 2
Total Noticed: 1

Date Rcvd: Oct 12, 2016

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 14, 2016.

db/jdb +Raymond Washington, Sharon Washington, 18 N. Joslyn, Pittsburgh, PA 15235-3928

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Oct 14, 2016

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 12, 2016 at the address(es) listed below:

Alexandra Teresa Garcia on behalf of Creditor Specialized Loan Servicing, LLC
ecfmail@mwc-law.com
Andrew F Gornall on behalf of Defendant Bank of New York Mellon fka The Bank of New York, as Trustee for the Certificateholders of the CWABS, Inc., Asset-backed Certificates, Series 2007-8 agornall@goldbecklaw.com, bkgroup@goldbecklaw.com;bkgroup@kmllawgroup.com
Andrew F Gornall on behalf of Creditor The Bank of New York Mellon fka The Bank of New York, as Trustee for the certificateholders of the CWABS, Inc. Asset-backed certificates, Series 2007-11 agornall@goldbecklaw.com, bkgroup@goldbecklaw.com;bkgroup@kmllawgroup.com
Andrew F Gornall on behalf of Creditor The Bank of New York Mellon FKA The Bank of New York, as Trustee for the certificateholders of the CWABS, Inc., Asset-Backed Certificates, Series 2007-8 agornall@goldbecklaw.com, bkgroup@goldbecklaw.com;bkgroup@kmllawgroup.com
Barbara A. Fein on behalf of Creditor Specialized Loan Servicing, LLC, Loan Servicing Agent for The Bank of New York Mellon, as Trustee juliep@lobaf.com, lawofficeofbarbarafein@gmail.com
Brian C. Thompson on behalf of Joint Debtor Sharon Washington bthompson@ThompsonAttorney.com, blemon@thompsonattorney.com;LaurenKelly@thompsonattorney.com;jwrzosek@thompsonattorney.com;mgille spie@thompsonattorney.com;azema@ecf.inforuptcy.com;noreply@thompsonattorney.com;mhodge@thompsonattorney.com
Brian C. Thompson on behalf of Plaintiff Sharon Washington bthompson@ThompsonAttorney.com, blemon@thompsonattorney.com;LaurenKelly@thompsonattorney.com;jwrzosek@thompsonattorney.com;mgille spie@thompsonattorney.com;azema@ecf.inforuptcy.com;noreply@thompsonattorney.com;mhodge@thompsonattorney.com
Brian C. Thompson on behalf of Debtor Raymond Washington bthompson@ThompsonAttorney.com, blemon@thompsonattorney.com;LaurenKelly@thompsonattorney.com;jwrzosek@thompsonattorney.com;mgille spie@thompsonattorney.com;azema@ecf.inforuptcy.com;noreply@thompsonattorney.com;mhodge@thompsonattorney.com
Brian C. Thompson on behalf of Attorney Grudowski & Thompson, P.C. bthompson@ThompsonAttorney.com, blemon@thompsonattorney.com;LaurenKelly@thompsonattorney.com;jwrzosek@thompsonattorney.com;mgille spie@thompsonattorney.com;azema@ecf.inforuptcy.com;noreply@thompsonattorney.com;mhodge@thompsonattorney.com
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Brian C. Thompson on behalf of Creditor Allegheny County bthompson@ThompsonAttorney.com, blemon@thompsonattorney.com;LaurenKelly@thompsonattorney.com;jwrzosek@thompsonattorney.com;mgille spie@thompsonattorney.com;azema@ecf.inforuptcy.com;noreply@thompsonattorney.com;mhodge@thompsonattorney.com
CSU - OUCTS, PA Labor & Industry ra-li-ucts-bankpitts@state.pa.us

District/off: 0315-2

User: kthe
Form ID: pdf900

Page 2 of 2
Total Noticed: 1

Date Rcvd: Oct 12, 2016

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system (continued)

Heather A. Sprague on Behalf of the United States Trustee by on behalf of U.S. Trustee Office of the United States Trustee Heather.Sprague@usdoj.gov,
Lisa.Geyer@usdoj.gov;David.A.Milko@usdoj.gov;Jennifer.M.Smith@usdoj.gov;David.A.Berry@usdoj.gov; Steven.W.Albright@usdoj.gov;Andrew.F.Cetnarowski@usdoj.gov
Hilary B. Bonial on behalf of Creditor HSBC Mortgage Services, Inc notice@bkcylaw.com
James A. Prostko on behalf of Creditor The Bank of New York Mellon fka The Bank of New York as Trustee pawb@fedphe.com, james.prostko@phelanhallinan.com
James A. Prostko on behalf of Creditor The Bank of New York Mellon pawb@fedphe.com, james.prostko@phelanhallinan.com
Jay B. Jones on behalf of Creditor The Bank of New York Mellon fka The Bank of New York as Trustee pawb@fedphe.com
Jeffrey R. Hunt on behalf of Debtor Raymond Washington jhunt@grblaw.com, cnoroski@grblaw.com
Jeffrey R. Hunt on behalf of Creditor Allegheny County jhunt@grblaw.com, cnoroski@grblaw.com
Jeffrey R. Hunt on behalf of Joint Debtor Sharon Washington jhunt@grblaw.com, cnoroski@grblaw.com
Jennifer L. Cerce on behalf of Creditor Penn Hills School District and Municipality of Penn Hills jlc@nmb-law.net
Jerome B. Blank on behalf of Creditor The Bank of New York Mellon pawb@fedphe.com
Kathleen Robb, on Behalf of the United States Trustee by on behalf of U.S. Trustee Office of the United States Trustee Kathleen.Robb@USDOJ.GOV
Lisa DiCerbo on behalf of Creditor United States Of America, Irs lisa.dicerbo@irs counsel.treas.gov, lisadicerbo@zoominternet.net;pitirs.bk.email@irs counsel.treas.gov
Margaret Gairo on behalf of Creditor The Bank of New York Mellon fka The Bank of New York as Trustee ecfmail@mwc-law.com
Office of the United States Trustee ustpregion03.pi.ecf@usdoj.gov
Paul William Cressman on behalf of Creditor The Bank of New York Mellon fka The Bank of New York as Trustee pawb@fedphe.com
Peter J. Ashcroft on behalf of Creditor The Bank of New York Mellon pashcroft@bersteinlaw.com, ckutch@ecf.courtdrive.com;pashcroft@ecf.courtdrive.com;pghecf@bersteinlaw.com;cabbott@ecf.courtdrive.com
Peter J. Ashcroft on behalf of Creditor Duquesne Light Company pashcroft@bersteinlaw.com, ckutch@ecf.courtdrive.com;pashcroft@ecf.courtdrive.com;pghecf@bersteinlaw.com;cabbott@ecf.courtdrive.com
Philip M. Oliss on behalf of Creditor Household Finance Consumer Discount Company Philip.oliss@squirepb.com
Steven K. Eisenberg on behalf of Creditor Household Finance Consumer Discount Company seisenberg@sterneisenberg.com, dbogucki@sterneisenberg.com;ckohn@sterneisenberg.com

TOTAL: 31